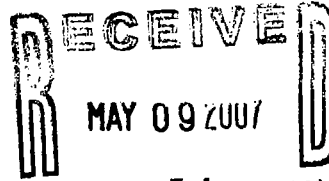


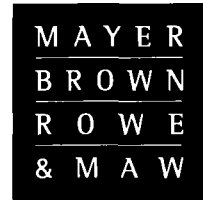


270505

E.C.
5/9/07



Emergency Enforcement
Services Section



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71 South Wacker Drive
Chicago, Illinois 60606-4637

Main Tel (312) 782-0600
Main Fax (312) 701-7711
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Robin R. Lunn
Direct Tel (312) 701-7274
rlunn@mayerbrownrowe.com

May 9, 2007

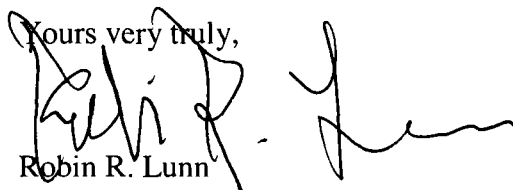
BY MESSENGER

William Ryczek
United States Environmental Protection Agency
Emergency Enforcement Services Section
SE-5J
77 W. Jackson Boulevard
Chicago, IL 60604-3590

Re: Clayton Chemical Site

Dear Mr. Ryczek:

Enclosed is a response on behalf of Illinois Tool Works Inc. ("ITW") to a Section 104(e) information request that had been directed to Futura Coatings, Inc. and sent to the business address of one of ITW's business units.

Yours very truly,

Robin R. Lunn

RRL/dm
Enclosure

cc: Bob Hank
Thomas Turner

**RRG/CLAYTON CHEMICAL SITE
CERCLA Section 104(e) Response
for
Illinois Tool Works Inc.
3600 West Lake Street
Glenview, IL 60025
May 7, 2007 Submission**

Note: The information request was addressed to Futura Coatings, Inc. at the address of a business unit of Illinois tool Works Inc. ("ITW"). As further described in answer 17 below, ITW is not directly or indirectly Futura Coatings, Inc., nor is it a successor thereto. ITW considers this response voluntary on its part. To the extent the information request implies that ITW is a successor to or is somehow responsible for the liabilities of Futura Coatings, Inc., ITW objects to such implication.

- (i) Bob Hank, Director of Environmental, Health and Safety, ITW.
- (ii) Asset Purchase Agreement dated August 12, 2003 by and among PMC, Inc., Futura Coatings, Inc. and ITW.
- (iii) PMC, Inc., 12243 Branford Street, Sun Valley, CA 91352 may have additional information.
- (iv) Unknown.
- (v) Unknown.
- (vi) Terry Walker who was formerly an employee of Futura Coatings, Inc. and is now an employee of ITW became production manager of Futura Coatings, Inc. in 1999 and Operations Manager in 2000. His recollection is at that time, an entity called Hazardous Waste Pollution Control picked up any hazardous waste from Futura Coatings, Inc. He is unaware of the ultimate destination of such waste. He believes that a gentleman by the name of John Folker, who retired from Futura Coatings, Inc. in 1997 and was never an employee of ITW may have further knowledge.
- (vii) Unknown.
 - (a) – (f) Unknown
- (viii) Unknown.
- (ix) – (x) ITW is not in possession of any of this information.
- 11. – 12. ITW believes these are inapplicable.
- 13. See response to paragraph (vi) above.

14. Unknown

15. Futura Coatings, Inc. was a business unit of PMC, Inc. On information and belief, ITW believes that DJR Holdings, Inc. may be a unit of PMC, Inc.

16. See responses to paragraphs 15 above and 17 below. On information and belief, ITW believes IPI International, Inc. may be a business unit of PMC, Inc.

17. ITW purchased certain assets of Futura Coatings, Inc. from Futura Coatings, Inc. and PMC Coatings, Inc., by Agreement dated August 12, 2003. The transaction closed on October 1, 2003.

On October 3, 2003 Futura Coatings, Inc. changed its name to F-Coatings via a filing with the Missouri Secretary of State.

The physical assets purchased by ITW were disassembled and crated by Sellers and removed from the loading dock of what had been Futura Coatings, Inc.'s place of business at 9700 Latty Avenue, Hazelwood, MO 63042.

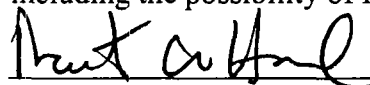
The lease for that property was an excluded liability under the Agreement and ITW never operated there.

The assets purchased were distributed to existing ITW facilities in Massachusetts, Michigan and Missouri.

"Futura Coatings" is a brand of products sold by ITW Devcon.

**Certification
for
RRG/CLAYTON CHEMICAL SITE
CERCLA Section 104(e) Response
On behalf of
Illinois Tool Works, Inc.
3600 West Lake Street
Glenview, IL 60025**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

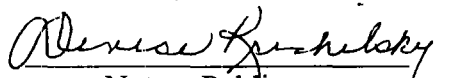


Bob Hank
Director Environmental, Health & Safety
Illinois Tool Works Inc.

5/8/07
Date

Subscribed and sworn to before a Notary Public in and for the State of Illinois,

This 8th day of May, 2007


Notary Public

